

COHEN, FRANKEL & RUGGIERO, LLP

ATTORNEYS AT LAW
20 VESEY STREET, SUITE 1200
NEW YORK, NEW YORK 10007
(212) 732-0002 • FAX (212) 293-7224

MARK I. COHEN
PETER M. FRANKEL
LOUIS J. RUGGIERO
MINA KENNEDY
JOHN R. BEATTIE
SHANE KELLY

90-11 35TH AVENUE
JACKSON HEIGHTS, NEW YORK 11372
(718) 898-4900 • FAX (718) 898-0093

April 1, 2008

FILED ELECTRONICALLY VIA ECF

Mr. Marlon Ovalles
Chambers of Hon. Paul A. Crotty, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

*Re: United States of America v. Sergio Vargas
08 Cr. 63 (PAC)*

Dear Mr. Ovalles:

I am in receipt of your E-mail regarding the scheduling of the above-mentioned matter, which is currently scheduled for a pre-trial conference on April 9, 2008. I am writing to request that the case be adjourned for approximately thirty (30) days to a date in May convenient to the Court. This request is being made because the parties are actively engaged in plea negotiations, and are requesting more time in order to reach an agreement regarding a pre-trial resolution of this matter.

I have spoken to Assistant United States Attorney David O'Neil regarding this request, and am informed that the Government has no objection to this request. Your understanding and accommodation is greatly appreciated.

Respectfully submitted,


Mark I. Cohen, Esq.



Cc: Assistant United States Attorney David O'Neil
Mr. Sergio Vargas